

Pro Se 14 (Rev. 12/16) Complaint for Violation of Civil Rights (Prisoner)

UNITED STATES DISTRICT COURT

for the
2019 SEP 20 P 1:27
District of _____

Division

Case No.

CA 19 - 497

(to be filled in by the Clerk's Office)

JERRY LINTON ^{ED#110502}

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint.
If the names of all the plaintiffs cannot fit in the space above,
please write "see attached" in the space and attach an additional
page with the full list of names.)

-v-

Paul Bibeaull, et al.

Defendant(s)

(Write the full name of each defendant who is being sued. If the
names of all the defendants cannot fit in the space above, please
write "see attached" in the space and attach an additional page
with the full list of names. Do not include addresses here.)

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS
(Prisoner Complaint)

NOTICE

Federal Rules of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Except as noted in this form, plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed in forma pauperis.

Pro Se 14 (Rev. 12/16) Complaint for Violation of Civil Rights (Prisoner)

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

All other names by which
you have been known:

ID Number

Current Institution

Address

JERRY CINTRON #110802
 ID#110802, P.O. Box 8274
 MEDIUM #1 SECURITY - R.I. D.O.C.
 Cranston RI 02920
City State Zip Code

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. Make sure that the defendant(s) listed below are identical to those contained in the above caption. For an individual defendant, include the person's job or title (*if known*) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both. Attach additional pages if needed.

Defendant No. 1

Name

Job or Title (*if known*)

Shield Number

Employer

Address

Paul Bibeault, et al.
 Investigator
 RI-D.O.C.-A.C.I. P.O. Box 8274
 Cranston RI 02920
City State Zip Code

☒ Individual capacity ☒ Official capacity

Defendant No. 2

Name

Job or Title (*if known*)

Shield Number

Employer

Address

Rui Ainiz, et al.
 Warden - MED #2
 RI-D.O.C.-A.C.I. P.O. Box 8274
 Cranston RI 02920
City State Zip Code

☒ Individual capacity ☒ Official capacity

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Defendant No. 3

Name

Job or Title (if known)

Shield Number

Employer

Address

Matthew Kettle, et al.
Assistant Director of Institutions40 Howard Ave
RI-DOJ - A.C.I.
Cranston RI 02920
City State Zip Code☒ Individual capacity ☒ Official capacity

Defendant No. 4

Name

Job or Title (if known)

Shield Number

Employer

Address

Patricia A. Coyne-Fagoc, et al.
Director40 Howard Ave
RI-DOJ - A.C.I.
Cranston RI 02920
City State Zip Code☒ Individual capacity ☒ Official capacity

II. Basis for Jurisdiction

Under 42 U.S.C. § 1983, you may sue state or local officials for the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws]." Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. Are you bringing suit against (check all that apply):

☐ Federal officials (a *Bivens* claim)☒ State or local officials (a § 1983 claim)

B. Section 1983 allows claims alleging the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws]." 42 U.S.C. § 1983. If you are suing under section 1983, what federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials?

CRUEL & UNUSUAL PUNISHMENT & DUE PROCESS

C. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are being violated by federal officials?

Continued
on
3A →

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DEFENDANT(S), CONT

#5 HAYES, LIEUTENANT,
RI DOC ACI-MED #1, P.O. Box, 8274
CRANSTON, RI. 02920 -
Individual & Official -
→ CAPACITY

#6 MOE, LIEUTENANT,
RI-DOC ACI-MED #2, P.O. Box, 8274
CRANSTON, RI 02920
Individual & Official -
→ CAPACITY

#7 BUSH, LIEUTENANT
RI. DOC ACI-MED #2, P.O. Box, 8274
CRANSTON RI 02920
Individual & official -
→ CAPACITY

#8 Cabral, Investigator,
RI-DOC ACI
CRANSTON RI 02920
Individual & Official -
→ CAPACITY

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DEFENDANT(S)

CONT.

#9. Jennifer Chapman, Chair member of Classification
RI-DOC ACI - MED #1, P.O. Box, 8274
CRANSTON, RI, 02920
Individual & official -
→ CAPACITY

#10. Franco, "Counselor";
RI-DOC-ACI-MED #1, P.O. Box, 8274
CRANSTON RI 02920
Individual & official -
→ CAPACITY

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- D. Section 1983 allows defendants to be found liable only when they have acted "under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia." 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed.

8th AMENDMENT = CRUEL & UNUSUAL PUNISHMENT
 14th AMENDMENT = DUE PROCESS

III. Prisoner Status

Indicate whether you are a prisoner or other confined person as follows (check all that apply):

- ☐ Pretrial detainee
- ☐ Civilly committed detainee
- ☐ Immigration detainee
- ☒ Convicted and sentenced state prisoner
- ☐ Convicted and sentenced federal prisoner
- ☐ Other (explain) _____

IV. Statement of Claim

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

- A. If the events giving rise to your claim arose outside an institution, describe where and when they arose.

DON'T APPLY

- B. If the events giving rise to your claim arose in an institution, describe where and when they arose.

"MEDIUM SECURITY- RI Doc-2019-Aug July"

C. What date and approximate time did the events giving rise to your claim(s) occur?

MEDIUM SECURITY - BETWEEN JULY and
Aug - 2019

D. What are the facts underlying your claim(s)? (For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)

ALL DEFENDANT(S) PARTICIPATED
DIRECTLY OR DELIBERATE INDIFFERENTLY
TO THE VIOLATION OF PLAINTIFF'S DUE PROCESS
RIGHTS VIA "DISCIPLINARY HEARINGS" THAT CAUSED
PLAINTIFF TO DO UNNECESSARY DISCIPLINARY SANCTIONS
IN VIOLATION OF PLAINTIFFS 8TH AMENDMENT.

V. Injuries

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

Due to the Blatant
UNCONSTITUTIONALITY OF THE "DISCIPLINARY HEARING"
and Classification Hearing Process at Medium #1
Plaintiff is UNCONSTITUTIONALLY subjected to
"Condition of Confinement" IN which Plaintiff was
denied visitation, programs, and loss of good time
ALL BECAUSE "DUE PROCESS" was violated by ALL THE
DEFENDANT(S) AND INCREASED SECURITY LEVELS

VI. Relief

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

Compensatory = \$100.00 A day / INDIVIDUALLY
Punitive = \$15,000 EACH / INDIVIDUALLY
INJUNCTIVE = EXPUNGE "ALL" TICKETS" Bookings"
AND Isolation time and put
ME BACK IN REGULAR POPULATION
SEE RELIEF
Continued on:

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CLAIM #1 CONT

→ E. Plaintiff has been unconstitutionally and systematically subjected to numerous of "DUE PROCESS" violations at his "Disciplinary Hearings" while incarcerated in the Rhode Island Dept. of CORR. At: "Medium #2 From July-2019 to Aug-2019 AND ALSO IN VIOLATION OF Plaintiff's 8th & 14th Amendments, AS WELL AS "WOIFF VS. McDONNELL"

F. IN ALL OF these UNCONSTITUTIONAL Disciplinary Hearing Proceedings Plaintiff HAS BEEN denied these Due Process Mandates:

#1 The opportunity to Question The "Charging officer"

#2 To Present Exculpatory Evidence.

#3 Impartial Hearing.

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Pg # 5-B

Claim #2. Cont.

F. Cont.

Proper Representation.
Via Counselor Etc.

And Because of these Above-mentioned "Due Process" Violations At these "Disciplinary Hearings" Plaintiff has been placed on: "Disciplinary Confinement" - **"SOLITARY CONFINEMENT"** for **450 DAYS** IN Violation of Plaintiff's 8th Amendment And 14th.

G. IN Addition - The "Disciplinary Hearings" Are Conducted By only a "Lieutenant" There is No 3-Member Committee AS Mandated in: "Wolff Vs McDonnell". The "Lieutenant" is the only Person Conducting these "Disciplinary Hearings." There is No "Committee" or "Charging Officer" to be Questioned at these "Disciplinary Hearings" About the MERIT or VALIDITY of The "CHARGE!!"

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CLAIM, #2 CONT.

H. This Process within itself is a Blatant "Due Process" Violation. Then to EXACERBATE THIS "Due Process" Violation, The "Lieutenant" who conduct these "Disciplinary Hearings" are either The "Supervisor" And/or "Subordinate", i.e. to Captains. of The officer That wrote Plaintiff the charge. Which is a Blatant "Conflict of Interest" Because you got officers, i.e., "Lieutenants" Adjudicating Charges written By their "Subordinates" OR "Superior"

I, ON: 07-22-2019 - AT MEDIUM #2 Security, Defendant Investigator Paul Bibault wrote Plaintiff A charge = Booking #142 (Substance Possession) However Defendant Paul Bibault Violated Plaintiff's "Due Process" Rights By Not producing "Exculpatory Evidence" Also By Being a Member of CLASS-COMMITTY to vote me To A "Higher Security" "Super MAX" Violating Plaintiff's "Due Process" Rights

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Pg #5-8

Claim #1, cont.

J. Plaintiff Tried to Argue The facts to this "Due process" Violation at His "Disciplinary Hearing" But Defendant "Lieutenant MOE" Denied plaintiff the opportunity to present this evidence and unjustly found plaintiff Guilty Given plaintiff 30-days (Solitary Confinement)

K. ON: 08-22-2019 - ALSO AT MEDIUM #1 Security, Defendant Investigator Paul Sibbault wrote plaintiff Another Charge = Booking #P43 (Violence) Saying That plaintiff and Inmate Davante News #154592 Succeeded To Traffic Narcotics, Again With 'No Proff' OR 'Exculpatory Evidence' Clearly Violating R.I. D.O.C # Policy 11-01-4 And plaintiff's "Due process" Rights.

L. Plaintiff Tried to Argue The facts to this "Due process" Violation at Disciplinary Hearing But Defendant "Lieutenant MOE" Denied plaintiff The opportunity to present this evidence and unjustly found plaintiff Guilty given plaintiff

⇒

CLAIM #2, CONT

L., CONT

1365-DAYS 11 "Solitary Confinement"¹⁰³

M. ALSO on-08-22-2019 AT MEDIUM #1
 Security Defendant Investigator
 Paul Bibault wrote plaintiff "Another"
 Charge = Booking #105 (Disobedience)
 However Defendant Paul Bibault
 Violated Plaintiff's "Due Process"
 Rights By not producing Evidence
 OR letting Plaintiff Question
 Charging Defendant at "Disciplinary
 Hearing"

N. Plaintiff Tried to Argue this
 "Due process" Violation at his
 "Disciplinary Hearing" But Defendant
 "Lieutenant MOE" Denied Plaintiff
 opportunity to present this Evidence
 and unjustly found Plaintiff Guilty
 Given Plaintiff (30-DAYS)
 "Solitary Confinement"

O. Please Note that ALSO Plaintiff
 was Booked #133 (Substance Abuse) →

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Claim #2. Cont

Q. Cont.

By Defendant "Lieutenant" Hayes" which was at Plaintiff's "Disciplinary Hearing" with Defendant "Lieutenant MOE" ~~Sally~~ which is a Violation of My "Due process" Rights.

P. Defendant "Lieutenant MOE" found plaintiff Guilty and was given (25 days) Solitary Confinement

Q NOTE: All Above Bookings Are and is The Same interaction it shows Malice and Sadistically Blatant practice to punish plaintiff given plaintiff a total of (450 days) "Solitary Confinement" violating plaintiff's 14th & 18th Amendments "Cruel and unusual punishment" and "Due process" Rights.

R. Plaintiff eventually is going to be sent to "High Security" due to his "Due process" Right to Question →

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Claim #1, Cont.

R. Cont.

"Charging Officer" at his
"Disciplinary Hearings" while at
(Medium #1).

S. Defendant Rui Diniz
Denied All of Plaintiff's Disciplinary
Appeals in which Plaintiff's
"Due process" rights was violated
upholding his Subordinates Violation
of Plaintiff's "Due process"

T. Due to Defendant, Warden
Rui Diniz's Denial of Plaintiff's
Appeals Plaintiff was Also
Sadistically Subjected to Months
of "Solitary Confinement" and
Sanctions in Violation of
8th Amendment.

V. Defendant(s) Patricia A. Coyne-Fague,
Matthew Kettle, and Rui Diniz
are All deliberate Indifferent
to these Unconstitutional
"Disciplinary Hearings"

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→

Claim #1. CONT

V. CONT.

"Due process" Violations That are Systematically Committed By their Subordinates, Without Intervening to stop Plaintiff and/or Prisoner's in General from Being UNCONSTITUTIONALLY Subjected to:

#1. "CONFLICT OF INTEREST" VIA "Lieutenants" Adjudicating Charges = Bookings Written By Their Subordinates = Officers, And/OR Superiors = Captains

#2. Denied the opportunity to Question the "Charging officer"

#3. PRESENT EXCUIPATORY EVIDENCE.

#4. DENIED impartiality, VIA Not Have A 3-Member Committee.

Pg#5-F

Claim #2, cont.

V. Had plaintiff not been subjected to the multitude of "Due Process" violations inscribed in this Claim #2 Above during the "Disciplinary Hearing" proceedings At: MEDIUM #1 Security- By: DEFENDANT(S).

Patricia A. Coyne-fague, MATTHEW Kettle, "Warden" Rui Diniz, "LT." MOE, "LT." Bush, "LT." Hayes, "Investigator" Paul Bibeault, "Investigator" Cabral, "Counselor" Franco.

W. Plaintiff wouldn't of Never have been Transferred to a Higher level prison, i.e. "High Security", Placed on: Solitary Confinement for a year 2 months - and 25 days Sadistically and punitively in Violation of his 14th and 8th Amendments The predicate of the 8th and 14th Amendment was to preclude such UNCONSTITUTIONAL MATHEMATICS.

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19#5-5

* RELIEF-REQUESTED *

#1 Compensatory Damages -
Plaintiff Request Compensatory
Damages in the Amount of:

("Compensatory Damages")

①# via "\$100.00 Dollars a day from each
Defendant Individually for -
Unconstitutionally and Sadistically
for Being placed on Disciplinary
Confinement "For more than 1 year"
for violating my "8th" = Cruel & Unusual
Punishment and "14" = Amendment -
Due process at Disciplinary Hearing.

#2 "PUNITIVE DAMAGES IN The Amount
of "\$15.000" Dollars). Against all the
Defendants Individually for
The Blatant Deliberate Malice and
Sadistic Violation of my
"8th" = CRUEL & UNUSUAL Punishment -
AND "14th" = Amendment Due process
Rights.

#3 "INJUNCTIVE RELIEF: Plaintiff is
Requesting 1) "INJUNCTIVE Relief"
To Have All my Bookings Expunged
Due to my "Due process" Rights
That were Violated During All of
Plaintiff's Disciplinary Hearing.

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*** RELIEF - REQUESTED ***

- (A.) Denied the opportunity to Question The officer who wrote the Booking At the Hearing.
- (B.) CONFLICT of INTEREST - the Hearing OFFICER is the Supervisor of the Charging officer.
- (C.) Denied the opportunity to present Evidence.
- (D.) Denied a impartial Hearing Due to only Having one Person to Do the Hearing. ie. LIEUTENANT.

Plaintive Should ALSO ASK for This UNConstitutional Disciplinary Proceedings to be "Abolish" to Perclude any other Prisoner from Being Subjected to this Arbitrary practice.

VII. Exhaustion of Administrative Remedies Administrative Procedures

The Prison Litigation Reform Act ("PLRA"), 42 U.S.C. § 1997e(a), requires that "[n]o action shall be brought with respect to prison conditions under section 1983 of this title, or any other Federal law, by a prisoner confined in any jail, prison, or other correctional facility until such administrative remedies as are available are exhausted."

Administrative remedies are also known as grievance procedures. Your case may be dismissed if you have not exhausted your administrative remedies.

A. Did your claim(s) arise while you were confined in a jail, prison, or other correctional facility?

☒ Yes

☐ No

If yes, name the jail, prison, or other correctional facility where you were confined at the time of the events giving rise to your claim(s).

MEDIUM #2 SECURITY RE-LOC

B. Does the jail, prison, or other correctional facility where your claim(s) arose have a grievance procedure?

☒ Yes

☐ No

☐ Do not know

C. Does the grievance procedure at the jail, prison, or other correctional facility where your claim(s) arose cover some or all of your claims?

☐ Yes

☒ No

☐ Do not know

If yes, which claim(s)?

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- D. Did you file a grievance in the jail, prison, or other correctional facility where your claim(s) arose concerning the facts relating to this complaint?

☐ Yes

☒ No

If no, did you file a grievance about the events described in this complaint at any other jail, prison, or other correctional facility?

☐ Yes

☒ No

- E. If you did file a grievance:

1. Where did you file the grievance?

Don't Apply

2. What did you claim in your grievance?

Don't Apply

3. What was the result, if any?

Don't Apply

4. What steps, if any, did you take to appeal that decision? Is the grievance process completed? If not, explain why not. (Describe all efforts to appeal to the highest level of the grievance process.)

Because you can not put in a grievance on disciplinary HEARINGS.

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F. If you did not file a grievance:

1. If there are any reasons why you did not file a grievance, state them here:

Because you can't grieve Disciplinary Hearings,
All issues were covered
via "Disc Appeal"

2. If you did not file a grievance but you did inform officials of your claim, state who you informed, when and how, and their response, if any:

The Charging Officer
Defendant Investigator P. Bibeault
And he said good luck just know.
I'm keeping you alive kid.

G. Please set forth any additional information that is relevant to the exhaustion of your administrative remedies.

ONLY MY "DISC APPEALS" were
All Denied

(Note: You may attach as exhibits to this complaint any documents related to the exhaustion of your administrative remedies.)

VIII. Previous Lawsuits

The "three strikes rule" bars a prisoner from bringing a civil action or an appeal in federal court without paying the filing fee if that prisoner has "on three or more prior occasions, while incarcerated or detained in any facility, brought an action or appeal in a court of the United States that was dismissed on the grounds that it is frivolous, malicious, or fails to state a claim upon which relief may be granted, unless the prisoner is under imminent danger of serious physical injury." 28 U.S.C. § 1915(g).

To the best of your knowledge, have you had a case dismissed based on this "three strikes rule"?

☐ Yes☒ No

If yes, state which court dismissed your case, when this occurred, and attach a copy of the order if possible.

None

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- A. Have you filed other lawsuits in state or federal court dealing with the same facts involved in this action?

☐ Yes

☒ No

- B. If your answer to A is yes, describe each lawsuit by answering questions 1 through 7 below. (If there is more than one lawsuit, describe the additional lawsuits on another page, using the same format.)

1. Parties to the previous lawsuit

Plaintiff(s) _____

Defendant(s) _____

N/A

2. Court (if federal court, name the district; if state court, name the county and State)

N/A

3. Docket or index number

N/A

4. Name of Judge assigned to your case

N/A

5. Approximate date of filing lawsuit

N/A

6. Is the case still pending?

☐ Yes

☐ No

N/A

If no, give the approximate date of disposition. _____

7. What was the result of the case? (For example: Was the case dismissed? Was judgment entered in your favor? Was the case appealed?)

- C. Have you filed other lawsuits in state or federal court otherwise relating to the conditions of your imprisonment?

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☒ Yes☐ No

D. If your answer to C is yes, describe each lawsuit by answering questions 1 through 7 below. (If there is more than one lawsuit, describe the additional lawsuits on another page, using the same format.)

1. Parties to the previous lawsuit

Plaintiff(s)

Jerry Cintron #110800

Defendant(s)

William M. Galligan, et

2. Court (if federal court, name the district; if state court, name the county and State)

US District Court - District of Rhode Island
1:17-cv-00305-M-PAS

3. Docket or index number

1:17-cv-00305-M-PAS

4. Name of Judge assigned to your case

District Judge John J. McConnell, Jr.

5. Approximate date of filing lawsuit

06-21-2017

6. Is the case still pending?

☐ Yes

☒ No

If no, give the approximate date of disposition

02-26-2018

7. What was the result of the case? (For example: Was the case dismissed? Was judgment entered in your favor? Was the case appealed?)

The case was dismissed.

IX. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing:


09/13/19

Signature of Plaintiff

Printed Name of Plaintiff

Prison Identification #

Prison Address


 Jerry Cintron
 #110802
 PO Box 8274
 Cranston RI 02920
 City State Zip Code

B. For Attorneys

Date of signing:

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Address

Telephone Number

E-mail Address

NONE
 N/A
 N/A
 City State Zip Code

* CERTIFICATE OF SERVICE *

I PRISONER, JERRY CINTRON
HEREBY THAT ON: September, 13
2019, I did in fact Mailed via
First-Class Mail A -
(42 USC-1983-Civil Complaint)
To

UNITED STATES District Court +
OF Rhode Island
ONE EXCHANGE TERRACE
PROVIDENCE, Rhode Island
02903

SIGNATURE: Jerry CINTRON #110802

DATE: 09/13/2019